

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
<i>ex rel.</i> BROOK JACKSON	§	
	§	
Relator,	§	
	§	
vs.	§	CASE NO. 1:21-cv-00008-MJT
	§	
VENTAVIA RESEARCH GROUP, LLC;	§	
PFIZER INC.; ICON PLC,	§	
	§	
Respondents.	§	

**DEFENDANT PFIZER INC'S UNOPPOSED MOTION TO WITHDRAW  
AND SUBSTITUTE CO-COUNSEL OF RECORD**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant Pfizer Inc. in the above styled and enumerated cause, and pursuant to the Federal Rules of Civil Procedure, files this Motion to Withdraw and Substitute Co-Counsel of Record and requests that this Court remove Tommy Lee Yeates of Moore Landrey, LLP, and the law firm of Moore Landrey, LLP as co-counsel for Defendant Pfizer Inc. and substitute Jack P. Carroll of Orgain Bell & Tucker, LLP. All future notices, correspondence and pleadings should be directed to:

Jack P. Carroll  
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All counsel with DLA Piper US LLP will also remain as counsel for Defendant Pfizer Inc. Relator, Ventavia Research Group, LLC and ICON plc do not oppose the withdrawal and substitution of co-counsel, and the withdrawal and substitution is not sought for delay.

Respectfully submitted,

**ORGAIN, BELL & TUCKER, L.L.P.**

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By: /s/ Jack P. Carroll

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-and-

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By: /s/ Tommy Yeates

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**CO-COUNSEL FOR DEFENDANT  
PFIZER INC.**

**CERTIFICATE OF CONFERENCE**

Substituting counsel has complied with the meet and confer requirement in Local Rule CV-7(h). Substituting counsel conferred with Relator, Ventavia Research Group, LLC and ICON plc on October 31, 2022, and they are not opposed to this motion.

/s/ Jack P. Carroll

Jack P. Carroll

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2<sup>nd</sup> day of November 2022, I electronically filed the foregoing document with the Clerk of Court for the U.S. District Court, Eastern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Jack P. Carroll  
Jack P. Carroll